

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

-----X
ERNESTO DARQUEA, on behalf :
of himself and all others similarly situated :
 :
Plaintiff, :
 :
-against- : Civil Action No. 1:05-CV-10438 (MLW)
 :
VIISAGE TCHNOLOGY, INC., :
BERNARD C. BAILEY, WILLIAM K. :
AULET and DENIS K. BERUBE, :
 :
Defendants. :

-----X
GERALD D. BRODER, on behalf of :
himself and all others similarly situated :
 :
Plaintiff, :
 :
-against- : Civil Action No. 1:05-CV-10475 (MLW)
 :
VIISAGE TECHNOLOGY, INC., :
BERNARD C. BAILEY, WILLIAM K. :
AULET and DENIS K. BERUBE, :
 :
Defendants. :

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[Captions continued on next page]

**MOTION OF THE NORWALK GROUP FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

-----X
JOHN FLYNN, on behalf of :
of himself and all others similarly situated :
 :
Plaintiff, :
 :
-against- : Civil Action No. 1:05-CV-10498 (MLW)
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
DENIS K. BERUBE, BUDDY G. BECK, :
MARCEL YON, THOMAS J. REILLY and :
CHARLES E. LEVINE, :
 :
Defendants. :
-----X
MIN CHANG, individually and on behalf :
of all others similarly situated :
 :
Plaintiff, :
 :
-against- : Civil Action No. 1:05-CV-10537 (MLW)
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
And DENIS K. BERUBE, :
 :
Defendants. :
-----X
JOSEPH MARTIN, on behalf of himself :
and all others similarly situated :
 :
Plaintiff, :
 :
-against- : Civil Action No. 1:05-CV-10577 (MLW)
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
and DENIS K. BERUBE, :
 :
Defendants. :
-----X
[Captions continued on next page]

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WAYNE CLARK, individually and on behalf :
of all others similarly situated :
 :
 :
Plaintiff, :
 :
 :
-against- : Civil Action No. 1:05-CV-10578 (MLW)
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
And DENIS K. BERUBE, :
 :
 :
Defendants. :
-----X
DAPENG LUO, on behalf of :
of himself and all others similarly situated :
 :
 :
Plaintiff, :
 :
 :
-against- : Civil Action No. 1:05-CV-10615 (MLW)
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
DENIS K. BERUBE, BUDDY G. BECK, :
MARCEL YON, THOMAS J. REILLY and :
CHARLES E. LEVINE, :
 :
 :
Defendants. :
-----X
OLYMPIA LEVINSTON STIEGELE, :
 :
 :
 :
Plaintiff, :
 :
 :
-against- : Civil Action No. 1:05-CV-10677 (MLW)
 :
 :
VIISAGE TECHNOLOGY, INC., BER :
BERNARD C. BAILEY, WILLIAM K. AULET, :
DENIS K. BERUBE, BUDDY G. BECK, :
MARCEL YON, THOMAS J. REILLY and :
CHARLES E. LEVINE, :
 :
 :
Defendants. :
-----X
[Captions continued on next page]

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TURNBERRY ASSET MANAGEMENT,	:
on behalf of itself and all others similarly situated	:
	:
Plaintiff,	:
	:
-against-	: Civil Action No. 1:05-CV-10725 (MLW)
	:
VIISAGE TECHNOLOGY, INC., BER	:
BERNARD C. BAILEY, WILLIAM K. AULET,	:
DENIS K. BERUBE, BUDDY G. BECK,	:
MARCEL YON, THOMAS J. REILLY and	:
CHARLES E. LEVINE,	:
	:
Defendants.	:
-----X	

Movant, the Norwalk Group (as defined in the accompanying Memorandum of Law), upon the Declaration of David Pastor, dated May 9, 2005, and the Exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court may consider at the hearing on this motion, hereby respectfully move this Court for an order in the form filed herewith: (1) consolidating all of the above-referenced actions; (2) appointing the Norwalk Group as Lead Plaintiff in the above-referenced action pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); and (3) approving the Norwalk Group's selection of Lead Counsel and Liaison Counsel.

Dated: May 9, 2005

Respectfully submitted,

/s/ David Pastor
David Pastor (BBO #391000)
John C. Martland (BBO #322980)
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Proposed Liaison Counsel

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Stephen A. Weiss

Eric T. Chaffin

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Facsimile: (212) 584-0799

Proposed Lead Counsel